

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: <u>4/25/07</u>
PAUL KING	:	VIOLATION:
CHARLES HOGAN,	:	21 U.S.C. § 846 (conspiracy to distribute
a/k/a "Snap"	:	5 kilograms or more of cocaine - 1 count)
	:	21 U.S.C. § 841 (possession with the intent to
	:	distribute 5 kilograms or more of cocaine - 1
	:	count)
	:	18 U.S.C. § 2 (aiding & abetting)
		Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about June 28, 2005, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**PAUL KING and
CHARLES HOGAN,
a/k/a "Snap,"**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 5 kilograms or more, that is, approximately 89.83 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendants PAUL KING and CHARLES HOGAN were members of a cocaine distribution organization that shipped approximately 89 kilograms of cocaine from Laredo, Texas to Philadelphia.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. In or about June 2005, defendants PAUL KING and CHARLES HOGAN and others known and unknown to the grand jury arranged the transportation of approximately 89 kilograms of cocaine, which was secreted inside a hollow steel pole, to Philadelphia via tractor trailer from Laredo, Texas.

On or about June 28, 2005

2. When the driver of the tractor trailer arrived in Philadelphia, he was directed by a person known to the grand jury (Person # 1) to a lot located at 2600 W. Dauphin Street in Philadelphia, which was controlled by defendant PAUL KING.

3. Upon arrival at the lot, defendants PAUL KING and CHARLES HOGAN and others known to the grand jury used a forklift to lift a steel pole off the bed of the trailer and used cutting equipment to cut open the steel pole and remove the cocaine from the pole.

4. Defendants PAUL KING and CHARLES HOGAN and others known to the grand jury loaded the cocaine into a white van.

5. Person # 1 drove the white van containing the cocaine to Germantown Avenue and Downton Street in Philadelphia, PA.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

_____ On or about June 28, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**PAUL KING and
CHARLES HOGAN,
a/k/a "Snap,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 5 kilograms or more, that is, approximately 89.83 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendants

**PAUL KING and
CHARLES HOGAN,
a/k/a "Snap,"**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**